

June 4, 2001

Mr. Barry Goodrich  
Delphi Delco Electronics Systems  
P.O. Box 9005, M.S. 8121  
Kokomo, IN 46904

Re: Minor Source Modification No:  
067-14147-00061

Dear Mr. Goodrich:

Delphi Delco Electronics Systems applied for a Part 70 operating permit on September 4, 1996 for an automotive electronic systems manufacturing plant. An application to modify the source was received on March 21, 2001. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction and operation at the source:

One (1) natural gas-fired boiler to be located in Plant 10 (identified as Boiler No. 1), having a maximum throughput capacity of 14.65 MMBtu per hour and exhausting at stack 10-F10-1. This new boiler replaces the permitted Ames Iron Works 14.65 MMBtu/hour boiler currently located in Plant 10. The new boiler will use the same stack used by the boiler it replaces.

The Minor Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). The source may begin operation upon issuance of the source modification approval.

Pursuant to Contract No. A305-0-00-36, IDEM, Office of Air Quality has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Amanda Baynham, ERG, P.O. Box 2010, Morrisville, North Carolina 27560, or call (919) 468-7910 to speak directly to Ms. Baynham. Questions may also be directed to Duane Van Laningham at IDEM, Office of Air Quality, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

ERG/AB

cc: File - Howard County  
U.S. EPA, Region V  
Air Compliance Section Inspector Ryan Hillman  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

# **PART 70 MINOR SOURCE MODIFICATION OFFICE OF AIR QUALITY**

**Delphi Delco Electronics Systems  
1800 E. Lincoln Road  
Kokomo, Indiana 46904**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.:067-14147-00061	
Original signed by Paul Dubenetzky Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 4, 2001

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## SECTION A

## SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary automotive electronic systems manufacturing plant.

Responsible Official:	Barry Goodrich
Source Address:	1800 E. Lincoln Road, Kokomo, Indiana 46904
Mailing Address:	P.O. Box 9005, M.S. 8121, Kokomo, 46904
SIC Code:	3679
County Location:	Howard
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source is approved to construct and operate the following emission units and pollution control devices:

One (1) natural gas-fired boiler located in Plant 10 (identified as Boiler No. 1), having a maximum throughput capacity of 14.65 MMBtu per hour and exhausting at stack 10-F10-1.

### A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).'
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## **SECTION B                      GENERAL CONSTRUCTION CONDITIONS**

### **B.1        Definitions [326 IAC 2-7-1]**

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Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### **B.2        Effective Date of the Permit [IC13-15-5-3]**

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Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

### **B.3        Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]**

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### **B.4        Source Modification [326 IAC 2-7-10.5]**

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This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5 when, prior to start of operation, the following requirements are met:

- (a)        The attached affidavit of construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section, verifying that the emission units were constructed as proposed in the application. The emissions units covered in the Minor Source Modification approval may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b)        If actual construction of the emissions units differs from the construction proposed in the application, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.
- (d)        The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.

## SECTION C GENERAL OPERATION CONDITIONS

### C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

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- (a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

### C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are

available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

**C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**C.4 Opacity [326 IAC 5-1]**

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Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.5 Operation of Equipment [326 IAC 2-7-6(6)]**

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Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

**Testing Requirements [326 IAC 2-7-6(1)]**

**C.6 Performance Testing [326 IAC 3-6]**

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(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

#### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

##### **C.7 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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If required by Section D, all monitoring and record keeping requirements shall be implemented when operation begins. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

#### **Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

##### **C.8 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### **C.9 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]**

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- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.



- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.10 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

One (1) natural gas-fired boiler located in Plant 10 (identified as Boiler No. 1), having a maximum throughput capacity of 14.65 MMBtu per hour and exhausting at stack 10-F10-1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Particulate Matter (PM) [326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 14.65 MMBtu per hour heat input boiler shall be limited to 0.24 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$P_t = \frac{1.09}{Q^{0.26}}$$

Where  $P_t$  = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

$Q$  = Total source maximum operating capacity rating in million Btu per hour heat input (349.7 MMBtu/hr)

- (b) Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

#### D.1.2 Particulate Matter and Sulfur Dioxide [326 IAC 12-1]

The boiler is subject to 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units), there are no applicable emission limitations only record keeping requirements as described in Condition D.1.4.

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.1.4 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain the following records:
- (1) Monthly fuel records.
  - (2) A certification signed by the owner or operator that the records of the fuel usage represent all of the fuel combusted during the period. The natural gas fired boiler certification does not require the certification of the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.5 Reporting Requirements

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- (a) A semi-annual summary of the information to document compliance with Condition D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 SOURCE MODIFICATION  
CERTIFICATION**

Source Name: Delphi Delco Electronics Systems  
Source Address: 1800 E. Lincoln Road, Kokomo, Indiana 46904  
Mailing Address: P.O. Box 9005, M.S. 8121, Kokomo, Indiana 46904  
Source Modification No.: 067-14147-00061

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.**

Please check what document is being certified:

- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Delphi Delco Electronics Systems  
Source Address: 1800 E. Lincoln Road, Kokomo, Indiana 46904  
Mailing Address: P.O. Box 9005, M.S. 8121, Kokomo, Indiana 46904  
Part 70 Permit No.: 067-14147-00061

9	Natural Gas Only
From:_____	To:_____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
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Signature:
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Printed Name:
---------------

Title/Position:
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Phone:
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Date:
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A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Part 70 Source Modification

#### Source Background and Description

Source Name:	Delphi Delco Electronics Systems
Source Location:	1800 E. Lincoln Road, Kokomo, Indiana 46904
County:	Howard
SIC Code:	3679
Operation Permit No.:	T 067-6505-00061
Operation Permit Issuance Date:	Not yet issued
Minor Source Modification No.:	067-14147-00061
Permit Reviewer:	ERG/AB

The Office of Air Quality (OAQ) has reviewed a modification application from Delphi Delco Electronics Systems relating to the construction of the following emission units and pollution control devices:

One (1) natural gas-fired boiler to be located in Plant 10 (identified as Boiler No. 1), having a maximum throughput capacity of 14.65 MMBtu per hour and exhausting at stack 10-F10-1.

(Note: This new boiler replaces the permitted Ames Iron Works 14.65 MMBtu/hour boiler currently located in Plant 10. The new boiler will use the same stack used by the boiler it replaces.)

#### History

On March 21, 2001, Delphi Delco Electronics Systems submitted an application to the OAQ requesting to replace the 14.65 MMBtu/hr boiler in plant 10 (identified as Boiler No.1) with a new 14.65 MMBtu/hr boiler. Delphi Delco Electronics Systems submitted their application for a Title V permit on September 4, 1996. This permit application is currently being reviewed by IDEM, OAQ.

#### Enforcement Issue

There are no enforcement actions pending.

#### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
10-F10-1	Boiler No. 1, Plant 10	55	2.0	2,970	325

#### Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:  
Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on March 21, 2001.

### Emission Calculations

See Appendix A for detailed emissions calculations (pages 1 and 2).

### Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.49
PM-10	0.49
SO <sub>2</sub>	0.039
VOC	0.35
CO	5.4
NO <sub>x</sub>	6.4

HAP's	Potential To Emit (tons/year)
Benzene	$1.3 \times 10^{-3}$
Dichlorobenzene	$7.7 \times 10^{-5}$
Formaldehyde	$4.8 \times 10^{-3}$
Hexane	$1.2 \times 10^{-1}$
Toluene	$2.2 \times 10^{-4}$
Lead	$3.2 \times 10^{-5}$
Cadmium	$7.1 \times 10^{-5}$
Chromium	$9.0 \times 10^{-5}$
Manganese	$2.4 \times 10^{-5}$
Nickel	$1.3 \times 10^{-4}$
TOTAL	Less than 1

Note: The emissions presented above are for the new boiler. Since this boiler replaces an older boiler of the same maximum capacity, there will be no emission increase in PTE after the old boiler is decommissioned.

### Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(6), because the New Source

Performance Standard (NSPS) 40 CFR 60, Subpart Dc applies to the new boiler. This subpart did not apply to the old boiler because the boiler was constructed in the 1960s.

The construction and operation of the new boiler is approved under the provisions of 326 IAC 2-7-10.5.

### County Attainment Status

The source is located in Howard County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Howard County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Howard County has been classified as attainment or unclassifiable for PM-10, SO<sub>2</sub>, CO, and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO <sub>2</sub>	less than 100
VOC	greater than 250
CO	less than 100
NO <sub>x</sub>	greater than 250

- (a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 250 tons per year or more.
- (b) These emissions are based upon data provided in the source's Part 70 application and the Annual Source Emissions Reports submitted in 1998 and 1999.
- (c) This source is not one of the 28 listed source categories.

### Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.



	Potential to Emit (tons/year)					
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>
Boiler No. 1, Plant 10(a)	0.49	0.49	0.039	0.35	5.4	6.4
PSP Significance Level	25	15	40	40	100	40

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

### Federal Rule Applicability

- (a) The new boiler is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40C, Subpart Dc) because the maximum heat input capacity is less than 100 MMBtu/hour and greater than or equal to 10 MMBtu/hour. Although none of the emission limitations provided in this subpart are applicable to the new boiler, the permittee must comply with the record keeping requirements.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.

### State Rule Applicability - Individual Facilities

#### 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4, the PM emissions from the 14.65 MMBtu per hour heat input boiler shall be limited to 0.24 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$P_t = \frac{1.09}{Q^{0.26}}$$

Where  $P_t$  = Pounds of particulate matter per million Btu heat input.

$Q$  = Total source maximum operating capacity rating in million Btu per hour heat input.

The source consists of the following boilers:

- (a) Two (2) 24.5 MMBtu/hr boilers;
- (b) Four (4) 20.9 MMBtu/hr boilers;
- (c) Seven (7) 16.7 MMBtu/hr boilers;
- (d) Six (6) 14.65 MMBtu/hr boilers (including five existing boilers and one new boiler); and
- (e) One (1) 12.6 MMBtu/hr boiler.

The total maximum heat input capacity for the entire source is 350 MMBtu/hr.

- (a) The Ames Iron Works boiler will be removed prior to installation of the new boiler.

**326 IAC 6-1-2 (Particulate Emission Limitations for Nonattainment Areas)**

The source is not subject to 326 IAC 6-1-2 because the potential to emit particulate matter for the source is less than one hundred (100) tons per year and the actual emissions of particulate matter are less than ten (10) tons.

**Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no compliance monitoring requirements applicable to this modification.

**Conclusion**

The construction of this proposed modification shall be subject to the conditions of the attached Part 70 Source Modification No. 067-14147-00061.

## Appendix A: Emissions Calculations

### Natural Gas Combustion Only

MM BTU/HR <100

Boiler # 1 in Plant 10

Company Name: Delphi Delco Electronics Systems

Address City IN Zip: Kokomo, Indiana 46904

MSM: 067-14147-00061

Plt ID: 00061

Reviewer: ERG/AB

Date: 04/03/01

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

14.7

128.3

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.00	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.488	0.488	0.039	6.417	0.353	5.390

\*PM emission factor is filterable and condensable PM.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

### Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only**

Page 2 of 2 TSD App A

**MM BTU/HR <100**

**Boiler # 1 in Plant 10**

**HAPs Emissions**

**Company Name: Delphi Delco Electronics Systems**

**Address City IN Zip: Kokomo, Indiana 46904**

**CP: 067-14147-00061**

**Plt ID: 00061**

**Reviewer: ERG/AB**

**Date: 04/03/01**

**HAPs - Organics**

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.348E-04	7.700E-05	4.813E-03	1.155E-01	2.182E-04

**HAPs - Metals**

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	3.208E-05	7.058E-05	8.983E-05	2.438E-05	1.348E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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